

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DIANE DEADERICK,)
vs. Plaintiff) Civil Action File No.
vs.) 1:15-cv-02508
CONTRACT CALLERS, INC.,)
Defendant.)

)

JOINT MOTION TO EXTEND DISCOVERY DEADLINE

COMES NOW, Contract Callers, Inc., Defendant, and Diane Deaderick, *pro se* Plaintiff, in the above-referenced matter, hereby moves this Honorable Court pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) to extend the discovery deadline for sixty (60) days, or up to and including December 4, 2015, and in support of which states as follows:

1. Plaintiff's complaint purports to allege violations of Telephone Consumer Protection Act (TCPA) 47 U.S.C. § 227 et seq., the Fair Debt Collections Practices Act (FDCPA) 15 U.S.C. § 1692 et seq., the Automatic Telephone Dialing Act (ATDA) 815 ILCS 305/22, violation of the Illinois Statute of Limitation 735 ILCS 5/13-205 § 13-205, Violation of the Fair Credit Act (FCRA) 15 U.S.C. § 1681.
2. On June 1, 2015, this Court entered an order closing discovery on October 5, 2015.
3. Since June 1, 2015, the parties have both propounded and answered written discovery. The parties are currently engaged in discussions relevant to the adequacy of the written discovery responses.
4. Defendant also noticed Plaintiff's deposition but postponed it given its position that the written discovery responses it has received are inadequate.

5. The parties have diligently attempted to complete discovery during the deadline but despite their attempts necessitate an additional sixty (60) days to complete discovery.
6. Additionally, on August 20th, 2015, Plaintiff filed an amended complaint purporting to add two new causes of action against Defendant. Defendant answered the complaint on September 23, 2015.
7. This is the parties' first request for such an extension and such an extension is not designed to unnecessarily delay the case.
8. The parties have discussed the need for an extension and agree that such a request is necessary.

WHEREFORE, Defendant and Plaintiff hereby jointly request that discovery be extended for sixty (60 days), or up to and including December 4, 2015.

By: /s/ Nicole M. Strickler
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CERTIFICATE OF SERVICE

I hereby certify that on September 23, 2015, I electronically filed the foregoing with the Clerk of the District Court using the CM/ECF system, and additionally, sent a copy of the foregoing regular mail, postage prepaid before the hour of 5:00pm to:

Diane Deaderick
8312 S. Clyde Ave.
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By: /s/ Nicole M. Strickler
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